

FILED IN OPEN COURT

7-2-21
Kevin P. Wimmer James H. Hatten, Clerk

By:  Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

UNITED STATES OF AMERICA

v.

SHANE TERHUNE

Criminal Information

No. 4:21-CR-00029

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about July 6, 2018, in the Northern District of Georgia, the defendant, SHANE TERHUNE, did knowingly and intentionally distribute a controlled substance, said act involving a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and Section 841(b)(1)(C), and Title 18, United States Code, Section 2.

Forfeiture Provision

Upon conviction the offense alleged in Count One, the defendant, SHANE TERHUNE, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violation, including but not limited to, the following:

- (a) MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense,

or conspiracy to commit such offense, for which the defendant is convicted.

If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

KURT R. ERSKINE
Acting United States Attorney



IRINA K. DUTCHER
Assistant United States Attorney
Georgia Bar No. 583088

600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
404-581-6000; Fax: 404-581-6181